

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MOHAMED ELDOSOUGI,

Defendant.

No. 1:21-cr-236 (MSN)

**MOTION OF THE UNITED STATES
FOR THE CONVENING A STATUS CONFERENCE**

On March 28, 2024, the defendant was arraigned on the pending indictment, and the Court scheduled the case for trial on July 1, 2024 (Dkt. 23). At the arraignment, the parties discussed the possibility of resolving the case prior to trial or, alternatively, seeking a continuance given the logistics of providing defense counsel with the discovery database that had been prepared for all of the defendants in the companion case of *United States v. Peter Le et al.*, No. 1:19-cr-57 (LO).

As of this date, the United States does not know whether the case will be resolved prior to trial, and, unless the trial is continued, the government will soon be required to have several federal prisoners moved from BOP facilities to Alexandria to prepare for trial. That process is costly and burdensome for BOP, the USMS, and the prisoners, as it can leave them in transit for weeks at a time. The United States would like to avoid those problems if, in fact, the case will not go to trial on July 1, 2024.

The more important issue, however, is the process by which defense counsel can receive the voluminous discovery that had been provided to the defendants, through counsel, in the

companion case. The government does not know what arrangements must be made by the Court to facilitate that process or whether the government must now duplicate the discovery process that had been done in the prior case. That effort, by itself, will take most – if not all – of the available time between now and the current trial date.

For these reasons, the United States requests that the Court schedule a conference to resolve these issues. The government has attempted to contact defense counsel to discuss the status of the case and additional discovery but has not been successful in doing so.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of May, 2024, I caused the foregoing document to be served on Larry Brown, counsel of record, through the Official Court Electronic Filing System.

/s/

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